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John J. Finnigan, Jr.
Senior Counsel

VIA OVERNIGHT MAIL

January 18, 2006

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

Re: The Annual Cost Recovery Filing for Demand Side Management by The Union
Light, Heat and Power Company
Case No. 2005-00402

Dear Ms. O'Donnell:

Enclosed please find an original and twelve copies of the Motion to Bifurcate The Pilot Home Emergency Assistance Program Portion of Annual Cost Recovery Filing for Demand Side Management by The Union Light, Heat and Power Company in the above-referenced case.

Please file-stamp and return the two extra copies in the enclosed over-night envelope.

If you have any questions regarding this filing, please call me at (513) 287-3601.

Sincerely,

John J. Finnigan, Jr.
Senior Counsel

JJF/sew

cc: All Parties of Record (with enclosures)

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:)
)
THE ANNUAL COST RECOVERY FILING) CASE No. 2005-00402
FOR DEMAND SIDE MANAGEMENT BY)
THE UNION LIGHT, HEAT AND POWER COMPANY)

**MOTION OF THE UNION LIGHT, HEAT AND POWER COMPANY
TO BIFURCATE
THE PILOT HOME EMERGENCY ASSISTANCE PROGRAM PORTION OF
ANNUAL COST RECOVERY FILING FOR DEMAND SIDE MANAGEMENT**

The Union Light, Heat and Power Company (“ULH&P”) respectfully requests that the Commission bifurcate these proceedings such that the Commission issue a decision as soon as practicable on ULH&P’s request for approval of a new Pilot Home Emergency Assistance Program (“the Program”) to be administered under the umbrella of ULH&P’s current WinterCare program.

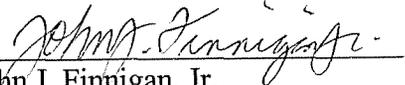
ULH&P has reached agreement with the Residential Collaborative to implement the Program. Based on low income customers’ need for immediate assistance due to high energy prices, ULH&P submits that good cause exists for the Commission to decide upon this Program as soon as practicable. ULH&P requests that the other aspects of its application be held open for later adjudication by the Commission. ULH&P has discussed such bifurcation with the Attorney General’s office and ULH&P understands that the Attorney General’s office supports this request for bifurcation.

WHEREFORE, ULH&P respectfully requests that the Commission approve request for bifurcation of the Pilot Home Emergency Assistance Program and that the

Program be considered by the Commission as requested herein.

Respectfully submitted,

THE UNION LIGHT, HEAT AND POWER
COMPANY

By: 
John J. Finnigan, Jr.,
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(Attorney No. 86657)
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CERTIFICATE OF SERVICE

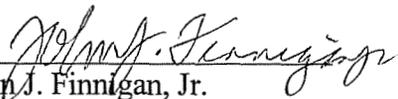
I hereby certify that a copy of the foregoing filing was served on the following via ordinary United States mail, postage prepaid, this 18th day of January, 2006:

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